

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF
PENNSYLVANIA, By Michelle A. Henry,
Attorney General,

Plaintiff,

vs.

PROSPECT MEDICAL HOLDINGS,
INC., PROSPECT CROZER, LLC,
LEONARD GREEN AND PARTNERS,
SAMUEL LEE, Individually, and DAVID
TOPPER, Individually,

Defendants.

CIVIL ACTION

Case No. 2:24-cv-05853-JP

DEFENDANTS SAMUEL LEE AND DAVID TOPPER

NOTICE OF CONSENT TO REMOVAL

Defendants Samuel Lee and David Topper hereby consent to the removal of this action from Delaware County Court of Common Pleas, Case No. 2024-009428, to the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. Defendants Samuel Lee and David Topper reserve all rights and defenses in this action.

DATED: November 25, 2024

Bird, Marella, Rhow,
Lincenberg, Drooks & Nessim, LLP

By: /s/ Devon E. Porter

Ekwan E. Rhow, Esquire (*Pro Hac Vice*
Application Pending)

Devon E. Porter, Esquire (PA Bar #327898)

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Attorneys for Defendants Samuel Lee and
David Topper

CERTIFICATE OF SERVICE

I, Devon E. Porter, Esquire hereby certify that on this 25th day of November, 2024, a true and correct copy of the foregoing Defendants Samuel Lee and David Topper Notice of Consent to Removal was served via ECF upon all counsel of record.

/s/ Devon E. Porter, Esq.

Devon E. Porter, Esq.